

GLUCK LAW FIRM

Jeffrey S. Gluck (SBN 304555)
jeff@gluckip.com
16950 Via De Santa Fe
Rancho Santa Fe, CA 92067
Telephone: 310 776 7413

WOOLLS PEER DOLLINGER & SCHER P.C.

ANTOINETTE WALLER (SBN 152895)
awaller@wpdslaw.com
12401 Wilshire Blvd., Second Floor
Los Angeles, CA 90025-1089
Telephone: (213) 629-1600
Facsimile: (213) 629-1660

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

KRISTA PERRY, an individual;
LARISSA MARTINEZ an individual;
JAY BARON an individual; RACHEL
PFEFFER, an individual; DIRT BIKE
KIDZ, Inc., a California corporation;
ESTELLEJOYLYNN, LLC, a New
Jersey limited liability company;
JESSICA LOUISE THOMPSON
SMITH, an individual; LIV LEE, an
individual;

Plaintiffs,

v.

SHEIN DISTRIBUTION
CORPORATION, a Delaware
corporation; ROADGET BUSINESS
PTE. LTD; ZOETOP BUSINESS CO.,
LTD.; SKY XU, a/k/a, CHRIS XU; and
GEORGE CHIAO.

Defendants.

Case No. 2:23-cv-05551-MCS-JPR
Hon. Mark C. Scarsi

**DECLARATION OF ANTOINETTE
WALLER IN SUPPORT OF
PLAINTIFFS' MOTION TO
COMPEL DEFENDANTS'
DISCOVERY**

I, Antoinette Waller, declare as follows:

1 1. I am an attorney with Woolls Peer Dollinger & Scher P.C., counsel for
2 Plaintiffs in the above-captioned action. This declaration is submitted in support of
3 Plaintiffs' motion to compel Defendants' discovery. I have personal knowledge of
4 the facts set forth herein and, if called as a witness, I could and would testify
5 competently to them.

6 2. Attached hereto as Exhibit 1 is a true and correct copy of Plaintiff
7 Krista Perry's Interrogatories Set One to Defendant George Chiao served on
8 Defendants on January 24, 2025.

9 3. Attached hereto as Exhibit 2 is a true and correct copy of Plaintiff
10 Krista Perry's Interrogatories Set One to Defendant Zoetop served January 24, 2025.

11 4. Attached hereto as Exhibit 3 is a true and correct copy of Plaintiff
12 Krista Perry's Interrogatories Set One to Defendant Shein Distribution Corporation
13 served January 24, 2025.

14 5. Attached hereto as Exhibit 4 is a true and correct copy of Plaintiff
15 Krista Perry's Interrogatories Set One to Defendant Roadget served January 24,
16 2025.

17 6. Attached hereto as Exhibit 5 is a true and correct copy of Plaintiff
18 Krista Perry's Requests for Production of Documents Set One to Defendant George
19 Chiao served January 24, 2025.

20 7. Attached hereto as Exhibit 6 is a true and correct copy of Plaintiff
21 Krista Perry's Requests for Production of Documents Set One to Defendant Zoetop
22 served January 24, 2025.

23 8. Attached hereto as Exhibit 7 is a true and correct copy of Plaintiff
24 Krista Perry's Requests for Production of Documents Set One to Defendant Shein
25 Distribution Corporation served January 24, 2025.

26 9. Attached hereto as Exhibit 8 is a true and correct copy of Plaintiff
27 Krista Perry's Requests for Production of Documents Set One to Defendant Roadget
28 served January 24, 2025.

1 10. Attached hereto as Exhibit 9 is a true and correct of Plaintiff Dirt Bike
2 Kidz's Interrogatories set one to Defendant Roadget served March 21, 2025.

3 11. Attached hereto as Exhibit 10 is a true and correct of Defendant
4 Roadget's responses to Plaintiff Krista Perry's Interrogatories served March 12,
5 2025.

6 12. Attached hereto as Exhibit 11 is a true and correct of Shein Distr.'s
7 Responses to Krista Perry's Interrogatories served March 12, 2025.

8 13. Attached hereto as Exhibit 12 is a true and correct of Zoetop's
9 Responses to Krista Perry's Interrogatories served March 12, 2025.

10 14. Attached hereto as Exhibit 13 is a true and correct of Defendant
11 Chiao's Responses to Krista Perry's Interrogatories served March 12, 2025.

12 15. Attached hereto as Exhibit 14 is a true and correct of Roadget's
13 Responses to Krista Perry's Requests for Production served March 12, 2025.

14 16. Attached hereto as Exhibit 15 is a true and correct of Shein's Distr.
15 Responses to Krista Perry's Requests for Production served March 12, 2025.

16 17. Attached hereto as Exhibit 16 is a true and correct of Zoetop's
17 Responses to Krista Perry's Requests for Production served March 12, 2025.

18 18. Attached hereto as Exhibit 17 is a true and correct of Chiao's
19 Responses to Krista Perry's Requests for Production served March 12, 2025.

20 19. Attached hereto as Exhibit 18 is a true and correct of Roadget's
21 Responses to Dirt Bike Kidz Rogs served May 21, 2025.

22 20. Attached hereto as Exhibit 19 is a true and correct of Plaintiffs' Notice
23 of Deposition of Defendant Shein Distribution Corp. pursuant to Federal Rule of
24 Civil Procedure 30(b)(6) served June 24, 2025.

25 21. Attached hereto as Exhibit 20 is a true and correct of Antoinette
26 Waller's July 21, 2025 Rule 37-1 letter to Defendants' counsel. As reflected in the
27 correspondence attached as exhibits hereto, I met and conferred on numerous
28 occasions with Defendants' counsel regarding the deficiencies in Defendants'

1 discovery responses, Defendants' failure to produce documents, and failure to
2 designate deponents for defendant SDC's 30(b)(6) deposition. Despite my meet and
3 confer efforts Defendants failed to supplement their discovery responses or
4 cooperate with discovery. Defendants also have not produced the documents they
5 agreed to produce in their discovery responses.

6 22. Attached hereto as Exhibit 21 is a true and correct of Ali Rabbani's
7 July 8, 2025 email Antoinette Waller.

8 23. Attached hereto as Exhibit 22 is a true and correct of Ali Rabbani's
9 July 14, 2025 email to Antoinette Waller.

10 24. Attached hereto as Exhibit 23 is a true and correct of Antoinette
11 Waller's July 25, 2025 email to A. Rabbani.

12 25. Attached hereto as Exhibit 24 is a true and correct of Antoinette
13 Waller's August 5, 2025 email to A. Rabbani.

14 26. Attached hereto as Exhibit 25 is a true and correct of Antoinette
15 Waller's August 7, 2025 email to A. Rabbani.

16 27. Attached hereto as Exhibit 26 is a true and correct of A. Rabbani's
17 August 8, 2025 letter to Antoinette Waller.

18 28. Attached hereto as Exhibit 27 is a true and correct of Antoinette
19 Waller's 3/17/25 letter to A. Rabbani.

20 29. Attached hereto as Exhibit 28 is a true and correct of Rabbani's 3/20/25
21 letter to A. Waller.

22 30. Attached hereto as Exhibit 29 is a true and correct of Defendants'
23 initial disclosures served February 28, 2025.

24 ///

25 ///

26 ///

27 ///

1 I declare under penalty of perjury under the laws of the United States of
2 America that the foregoing facts are true and correct.

3 Executed this 27th day of August 2025 at Los Angeles, California.

4
5 /s/ Antoinette Waller
6 Antoinette Waller
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28